

# **EXHIBIT C**

## **Woods, Edward**

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**From:** Woods, Edward  
**Sent:** Monday, July 29, 2019 11:00 AM  
**To:** Morgenstern, Robert B.  
**Subject:** FW: Memorandum for the record of meeting with Dr. Morganstern CMO and Ms. Kovalcik risk manager Sharon Regional Medical Center on 19 June 2019.

Here as a memorandum for the record of our conversation of 17 June 2019 and meeting of 18 June 2019. I follow Dr. Mittys instructions as to sending this memorandum which I written first through with the filter of Dr. Priest. It is been 3 weeks since I sent this and I have heard no response from you. I have had no apology or any effort at rapprochement by you. [REDACTED]

hostile workplace environment as part of a bigger investigation of S RMC. [REDACTED]

[REDACTED]  
Sincerely  
Edward L. Woods, MD

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**From:** Woods, Edward  
**Sent:** Tuesday, July 9, 2019 2:03 PM  
**To:** Priest, Brian P. <Brian.Priest@steward.org>  
**Subject:** Memorandum for the record of meeting with Dr. Morganstern CMO and Ms. Kovalcik risk manager Sharon Regional Medical Center on 19 June 2019.

I am following your instructions and Rogers to forward to you any memorandum for the record which I would send to Dr. Morganstern directly. This memorandum contains very serious issues of threats intimidation retaliation and hostile workplace environment. This memorandum is written to Dr. Morganstern. As of 1333 on 9 July 2019 I have received no apology from Dr. Morganstern for his unprofessional behavior on 19 June 2019. Tomorrow I am making an appointment with human resources to go forward with my complaint concerning Dr. Morganstern CMO and Mr.Hugar the CEO who is behavior also is unprofessional.

I wrote this memorandum on 19 June 2019 and have the original copy.

This is a memorandum for the record of the above meeting. It covers several parts. I showed you my hand was trembling as I was not sure if I was going to be escorted off the premises after the meeting. We have discussed many times the importance of sending memorandum for the record and including that it be sent to the individual involved. As we talked about before and has 3 legal experts have told me time passes, memories fade and people lie. Therefore document everything.

- 1) at 1635 on 17 June 2019 you called me to tell me I had created a security breech of Steward medical group and that it would have to be reported to Stewart corporate operations. You asked me if I was in the hospital. I told you I just left. You told me to be in your office at 0 900. It was such a threatening call that I was uncertain if I was to be escorted off the premises after our meeting at 0 900. I immediately called [REDACTED]

[REDACTED] I expected a call from you telling me that it had been a misunderstanding. I have much too experienced to expect an apology in a situation like this from an administrator. I received no call. When I met with you in the presence of the risk manager your witness you proceeded to lecture me on the use of email. You stated that they are not secure. I told you we discussed the email and documentation and that you told me as long as I used the SMG sent system it was protected. (Issues involving patient treatment payment and operational issues of quality of care are not hip

violations). The email which I sent involved 2 of the 3 topics. It did not involve billing. You then proceeded to tell me you had instructed me to put (SECURE) on the top of any emails that I sent. And that Mrs. Carla Vick had witnessed your telling me this. You never told me this or I would have done it I have sent you multiple emails which are pages long. Wyant world with any jury think that his surgeon who had put the last 2 weeks of his life trying to protect SMG S RMC ignore a warning like that? Who would believe a surgeon who is so thorough to include time and dates of events would ignore a warning like that? It is one word in the 2-4 page email. I am strictly within my chain of command which includes you.

2) You lectured me on" your job is not to prosecute Dr. Conner. Your job is solely to care for the patient." I was shocked by this comment. You Ms. Carla Vick and I discussed [REDACTED]

[REDACTED] You are an IT expert. You said the old system time stamped everything but you are unsure if the new system did. I told you there is one way to find out. Ask. I thought that she wanted to actually know the information that you as CMO should be responsible for. Your job is to monitor the activity of the medical staff. It seemed perfectly reasonable to me that she would want to know this information to better do your job. The report exposed and inconvenient fact for which I am now criticized for knowing but which you and I both discussed in detail. I thought you were interested and I thought I was helping you. I am encouraged that as recently as Tuesday, 18 June 2019 because of my raising this issue the

[REDACTED] I think this is a major upgrade inpatient care and I am glad that I brought it forward and force this issue. [REDACTED]

[REDACTED] Congratulations to you as CMO or following through on this in spite of the fact you criticize me for knowing this inconvenient fact. [REDACTED]

3) At the conclusion of this intense interview where you had lectured me on email security and my responsibility in the care of the patient and [REDACTED]

[REDACTED] you then proceed to ask me if I had a psychologist. I said no. You said then you should get 1 or go to EAP. I told you that this was a second time I had been told did I want a referral to EAP. The first time was with Teresa Collins, Sr. administrator SMG Sharon market to me on 15 April 2019 I told you that I told her about the events of Dr. Connors [REDACTED]

[REDACTED] I told you that I am telling you the same thing I told her. I survive yet and I will survive this. I have will heal when I have answers to 3 questions 1 ) wire over the hiring safeguards ignored? 2) why was this allowed to go on for so long? 3) do we prevent this from happening in the future.

4) At the conclusion of this meeting you appeared quite angry and agitated. You stood up to your full height and said in a very angry voice " and you may be facing legal action". I sent you an email immediately after the meeting asking what legal action you contemplated I might be subject to. (To date I have had no response from you.)

I am morally injured and a second victim over the events of the past tenth 10 months. This latest event happened over the past 2 weeks. It is current and it is ongoing. [REDACTED]

[REDACTED] I tell you the fax. Is this recommendation for a psychologist in preparation service for some form of

a job action? I spent the last 2 weeks of my life determining what it happened and how to move forward.

You were wrong according to the SMG risk manager and telling me that I needed to put secure on the top of the form which you had never done anyway.

You then stepped over the line into interpersonal tach on me by telling me that I needed psychological counseling for bringing you an inconvenient fact that you should have determined on your own. You compounded this by threatening me with legal action. Your unprofessional behavior does not become 1 who has the position of chief medical officer. I have heard of your behavior in the past from other physicians but it has never been directed at me. He would previously told me you wanted a full disclosure of all fax to the patient. This changed when I had something to disclose.

Sincerely  
Edward L. Woods, MD

I am not sending this to Dr. Morganstern unless you give me permission. I am sorry to burden you with these issues but that is unavoidable.